

CILENTI & COOPER, PLLC

ATTORNEYS AT LAW

60 East 42nd Street - 40th Floor
New York, New York 10165

Telephone (212) 209-3933
Facsimile (212) 209-7102

September 4, 2024

**JOINT STATUS REPORT
AND MOTION FOR EXTENSION OF TIME**

By ECF

Honorable Jessica G. L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**Re: *Miguel Angel Infante Santiago v. Belmont Realty LLC, et. al.*
Case No. 24 Civ. 2041 (JGLC)**

Dear Judge Clarke,

We are counsel to plaintiff Miguel Angel Infante Santiago in this employment dispute / wage and hour action brought pursuant to the FLSA and New York Labor Law. We write jointly with defense counsel with reference to the court's order that the parties file a status report by September 10th [Docket 18].

The parties have met with the court-appointed mediator and continue to pursue a negotiated resolution of this matter. The parties are working in good faith and with the assistance and cooperation of the mediator and file this request jointly, to extend all deadlines including defendants' time to respond to the complaint, an additional sixty (60) days.

We acknowledge that this is not the parties' first request, but experienced counsel believe that a resolution can be reached and are cooperating with each other to save litigation expenses. Moreover, discussions have been productive, and counsel jointly believe this to be in the interest of judicial economy as well as their respective clients. No other deadlines will be impacted, and this extension will allow the parties the space needed to reach a resolution.

Hon. Jessica G. L. Clarke
September 4, 2024
Page 2

As such for the foregoing reasons we respectfully ask the court to extend all deadlines one final time, through November 4th.

Thank you for your consideration of this case.

Respectfully submitted,

Peter Hans Cooper

Peter H. Cooper

cc: Defense Counsel Sara David, Esq., (Via E-mail and ECF)

Application GRANTED. The parties' discovery deadlines are hereby STAYED pending their participation in mediation. The parties are ORDERED to submit a joint status letter to the Court by **November 5, 2024**. Defendants' deadline to respond to the Complaint is extended to **November 5, 2024**. The Court will not grant any further extensions absent extraordinary circumstances. The Clerk of Court is directed to terminate ECF No. 19.

SO ORDERED.

Jessica Clarke

JESSICA G. L. CLARKE
United States District Judge

Dated: September 5, 2024
New York, New York